

1 WILKE FLEURY LLP
DANIEL L. EGAN (SBN 142631)
2 degan@wilkefleury.com
JASON G. ELDRED (SBN 327148)
3 jeldred@wilkefleury.com
621 Capitol Mall, Suite 900
4 Sacramento, California 95814
Telephone: (916) 441-2430
5 Facsimile: (916) 442-6664

6 Attorneys for CHASE 1992 FAMILY TRUST

7
8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION
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11 In re:
12 LEFEVER MATTSON, a California
corporation, et al.,
13 Debtors.
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Case No. 24-10545
Chapter 11

**SUPPORT OF CHASE 1992 FAMILY
TRUST TO TRUSTEE'S MOTION
UNDER 11 U.S.C. § 1104(c) TO APPOINT
A CHAPTER 11 EXAMINER OR, IN THE
ALTERNATIVE, A CHAPTER 11
TRUSTEE UNDER 11 U.S.C. § 1104(a),
AND RESERVATION OF RIGHTS**

Date: April 2, 2025
Time: 11:00 a.m.
Place: 1300 Clay Street, Courtroom 215
Oakland, CA 94612

The Hon. Charles D. Novack

21 The Chase 1992 Family Trust (the "Chase Trust") submits this statement in support of the
22 Motion of the United States Trustee To appoint a Chapter 11 Examiner or, in the alternative, a
23 Chapter 11 Trustee under 11 U.S.C. section 1104(a), and reservation of rights.

24 For the reasons set forth in the opposition filed by the Chase Trust to the debtor's motion to
25 extend exclusivity filed concurrently herewith, the Chase Trust supports the appointment of a
26 Chapter 11 Trustee in the case of Live Oak Investments, LP. The Chase Trust opposes appointment

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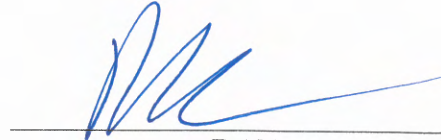
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1 of a Chapter 11 Examiner as an examiner will not be helpful in this case and will, instead, simply
2 add an additional layer of unnecessary professional expense.

3 DATED: March 7, 2025

WILKE FLEURY LLP

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5 By:



6 DANIEL L. EGAN
7 Attorneys for CHASE 1992 FAMILY TRUST
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PROOF OF SERVICE

24-10545

STATE OF CALIFORNIA, COUNTY OF SACRAMENTO

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Sacramento, State of California. My business address is 621 Capitol Mall, Suite 900, Sacramento, CA 95814.

On March 7, 2025, I served true copies of the following document(s) described as

SUPPORT OF CHASE 1992 FAMILY TRUST TO TRUSTEE'S MOTION UNDER 11 U.S.C. § 1104(c) TO APPOINT A CHAPTER 11 EXAMINER OR, IN THE ALTERNATIVE, A CHAPTER 11 TRUSTEE UNDER 11 U.S.C. § 1104(a), AND RESERVATION OF RIGHTS

on the interested parties in this action as follows:

☒ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- **Kyra E. Andrassy** kandrassy@raineslaw.com, csheets@swelawfirm.com
- **Roxanne Bahadurji** rbahadurji@sullivanblackburn.com, ecf@macfern.com
- **Mia S. Blackler** mblackler@lubinolson.com
- **Mark Bostick** mbostick@fennemorelaw.com, ecfbankruptcy@fennemorelaw.com
- **Theodore A. Cohen** TCohen@sheppardmullin.com, mtzeng@sheppardmullin.com
- **Christopher Crowell** ccrowell@hrhlaw.com
- **Devan Dal Col** ddalcol@reedsmith.com
- **Jared A. Day** jared.a.day@usdoj.gov
- **John D. Fiero** jfiero@pszjlaw.com, ocarpio@pszjlaw.com
- **Charles R Gibbs** crgibbs@mwe.com
- **Bernard R. Given** bgiven@loeb.com
- **Steven W Golden** sgolden@pszjlaw.com
- **Debra I. Grassgreen** dgrassgreen@pszjlaw.com, hphan@pszjlaw.com
- **Mitchell B. Greenberg** mgreenberg@abbeylaw.com, mmeroney@abbeylaw.com
- **Christopher V. Hawkins** chawkins@fennemorelaw.com, Hawkins@ecf.inforruptcy.com
- **Deanna K. Hazelton** deanna.k.hazelton@usdoj.gov
- **Gabriel P Herrera** gherrera@kmtg.com, bxiong@kmtg.com
- **James P. Hill** jhill@fennemorelaw.com, bkstaff@sullivanhill.com
- **Catherine Holzhauser** cholzhauser@beesontayer.com, awheeler@beesontayer.com
- **Marsha Houston** mhouston@reedsmith.com, hvalencia@reedsmith.com
- **Lance N. Jurich** ljurich@loeb.com, pmatsuda@loeb.com
- **Robert B. Kaplan** rbk@jmbm.com
- **Ivo Keller** ikeller@sflaw.com
- **Tobias S. Keller** tkeller@kbklp.com

- **Thomas Philip Kelly** tomkelly@sonic.net
- **Jeannie Kim** jekim@sheppardmullin.com, dgatmen@sheppardmullin.com
- **Chris D. Kuhner** c.kuhner@kornfieldlaw.com, g.michael@kornfieldlaw.com
- **Benjamin R. Levinson** ben@benlevinsonlaw.com
- **Sarah Lampi Little** sarah@kornfieldlaw.com
- **Christopher M. McDermott** ecfcanb@aldridgepite.com, CMM@ecf.inforuptcy.com
- **Paul David Moak** pmoak@reedsmith.com
- **Thomas G. Mouzes** tmouzes@boutinjones.com
- **Eric A. Nyberg** e.nyberg@kornfieldlaw.com, g.michael@kornfieldlaw.com
- **Abigail O'Brient** AOBrient@cov.com, docketing@cov.com
- **Office of the U.S. Trustee / SR** USTPRegion17.SF.ECF@usdoj.gov
- **Eric S. Pezold** epezold@swlaw.com, fcardenas@swlaw.com
- **William L. Porter** bporter@porterlaw.com, Ooberg@porterlaw.com
- **Douglas B. Provencher** dbp@provlaw.com
- **Yasha Rahimzadeh** yrlaw@attorneynorcal.com
- **Jason Rosell** jrosell@pszjlaw.com, mrenck@pszjlaw.com
- **Vadim J Rubinstein** vrubinstein@loeb.com
- **Thomas B. Rupp** trupp@kbkllp.com
- **Eric C. Seitz** eseitz@mwe.com
- **Phillip John Shine** phillip.shine@usdoj.gov
- **Wayne A. Silver** ws@waynesilverlaw.com, ws@waynesilverlaw.com
- **Boris Smyslov** attorney.boris@gmail.com
- **Andrew B. Still** astill@swlaw.com, kcollins@swlaw.com
- **Jason D. Strabo** jstrabo@mwe.com, dnorthrop@mwe.com
- **Sarah M. Stuppi** sarah@stuppilaw.com
- **Christopher D. Sullivan** csullivan@sullivanblackburn.com, AJTorio@sullivanblackburn.com
- **Thomas A. Willoughby** twilloughby@ffwplaw.com, docket@ffwplaw.com
- **Brooke Elizabeth Wilson** bwilson@pszjlaw.com
- **Jennifer C. Wong** bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com
- **Bennett G. Young** byoung@jmbm.com, jb8@jmbm.com

☒ **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Wilke Fleury LLP's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

**Ally Bank Lease Trust - Assignor to Vehicle Ally Bank, c/o AIS Portfolio Services, LLC
Asset Universal Leasing Trust (a.k.a. 4515 N Santa Fe Ave. Dept. APS
"VAULT TRUST", or "V.A.U.L. Trust", or Oklahoma City, OK 73118
"VAULT", or "V.A.U.L.T."), c/o AIS Port
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118**

Ashley Beane
Litigation & Asset Resolution
Legal Division
8200 Jones Branch Dr.
McLean, VA 22102

Donald S. Davidson
2950 Buskirk Ave., Ste 300
Walnut Creek, CA 94597

Debra Dellacort-Williams
5 Burgundy Way
Yountville, CA 94599

Kurtzman Carson Consultants, LLC dba Verita Global
222 N. Pacific Coast Highway
Suite 300
El Segundo, CA 90245

KKG Inc.
750 Mason St., Ste 101
Vacaville, CA 95688

CBRE, Inc.
415 Mission St., 46th Fl
San Francisco, CA 94105

Marcus & Millichap
2626 Hanover Street
Palo Alto, CA 94304

Pachulski Stang Ziehl & Jones LLP
One Sansome Street
34th Floor, Suite 3430
San Francisco, CA 94104-4436

Terre Price
81 De La Guerra Rd
San Rafael, CA 94903

SSL Law Firm LLP
505 Montgomery St., Ste 620
San Francisco, CA 94111

Sotheby's International Realty
428 First Street East
Sonoma, CA 95476

Caroline Sischo
Sheppard, Mullin, Richter and Hampton
350 South Grand Avenue, 40th Floor
Los Angeles, CA 90071

Tri Counties Bank
Mark H. Atkins
Tri Counties Bank
Attn: Legal Department
Post Office Box 992570
Redding, CA 96099-2570

The Lake Tahoe Brokerage Company
P.O. Box 3757
Truckee, CA 96160

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on March 7, 2025, at Sacramento, California.



Stephanie Douglas